

EXHIBIT 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CISCO SYSTEMS,)
INC.,)
Plaintiff,)
vs.) No. 5:14-cv-05344-BLF (PSG)
ARISTA NETWORKS,)
INC.,)
Defendant.)

CONFIDENTIAL INFORMATION UNDER THE PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF ANTHONY J. LI

Palo Alto, CA

Monday, February 1, 2016

Volume I

Reported by: SUSAN F. MAGEE, RPR, CCRR, CLR

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Plaintiff,)
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CONFIDENTIAL INFORMATION UNDER THE
PROTECTIVE ORDER VIDEO DEPOSITION OF ANTHONY J. LI
taken on behalf of Defendant at WILSON, SONSINI,
GOODRICH & ROSATI, 601 South California Avenue,
Palo Alto, CA 94304, beginning at 9:13 a.m. and
ending at 4:17 p.m. on Monday, February 1, 2016,
before Susan F. Magee, RPR, CCRR, CLR, Certified
Shorthand Reporter No. 11661.

1 for defendant Arista Networks.

2 MR. FERRALL: Brian Ferrall, Keker & Van
3 Nest, also for Arista.

4 MR. PAK: Sean Pak of Quinn for Cisco.

5 THE VIDEOGRAPHER: Thank you. 09:15:16

6 Will the court reporter please swear in the
7 witness.

8
9 ANTHONY J. LI,
10 having been administered an oath, was examined and 09:15:19
11 testified as follows:

12
13 EXAMINATION BY MR. WONG

14
15 Q. Good morning, Mr. Li. 09:15:29

16 A. Good morning.

17 Q. Please state your full name.

18 A. Anthony Joseph Li.

19 Q. Do you live in the Bay Area, Mr. Li?

20 A. I do. 09:15:36

21 Q. Please state your home address.

22 A. 1218 Thurston Avenue, Los Altos, California
23 94024.

24 Q. Mr. Li, do you understand that are you
25 testifying here in response to a subpoena in this 09:15:46

1 Q. Do you believe you are the originator of
2 the commands listed on Exhibit 149?

3 A. I have no direct recollection of many of
4 these commands; however, it certainly seems
5 possible. I was the originator of many commands 02:18:52
6 during my tenure at Cisco, and none of these seem
7 unthinkable. I would -- on some of them I have some
8 concerns, so I would love to see the specific code
9 diff that was suggested because I certainly don't
10 recognize some of them. 02:19:10

11 Q. Which of the commands don't you recognize?

12 A. The "show snmp view," I don't remember
13 doing that. I could have. I don't dispute that,
14 but I certainly don't remember it.

15 Some of the other ones, the 02:19:28
16 "default-information originate (OSPF)," that
17 seems -- it's possible, but that seems less likely.

18 Q. And are there any other commands where you
19 have doubts as to whether you contributed?

20 A. The other OSPF ones. 02:19:46

21 Q. And why do you have doubts about whether
22 you contributed the two OSPF commands?

23 A. I didn't spend a lot of time working in
24 OSPF directly. Now, that said, I also did spend a
25 lot of time going around and cleaning up other 02:20:01

1 people's CLI commands; so I could have easily done
2 it and forgotten about it.

3 Q. And when you went around cleaning up other
4 people's CLI commands, what do you mean by "cleaning
5 up"? 02:20:11

6 A. I would change the syntax, the
7 implementation, some of the semantics to try to make
8 it more regular and consistent with the remainder of
9 the Cisco CLI.

10 Q. But you would -- to what extent would you 02:20:23
11 use what the prior creator of the command proposed?

12 A. So frequently if I was cleaning it up, I
13 wouldn't use very much of it at all. I would
14 endeavor to do what was consistent with the rest of
15 the CLI first. 02:20:38

16 Q. Looking at the list in 149, to what extent,
17 if at all, did any of the commands or portions of
18 the commands originate from collaboration with
19 individuals outside of Cisco?

20 A. Certainly much of the work on peer groups, 02:20:55
21 that was encouraged by customers. "Load-sharing"
22 was definitely prodded by customers.
23 "Maximum-paths" changes would have been a feature
24 request from a customer.

25 So almost everything would have been at 02:21:24

1 A. I believe at least IDR BGP.

2 Q. And do you recall whether -- can you say
3 his name one more time.

4 A. Dimitry Haskin.

5 Q. Haskin. Do you recall whether Mr. Haskin 02:58:17
6 on behalf of Wellfleet was proposing a GUI interface
7 for the BGP functionality at the time?

8 A. So he was not proposing any interface
9 inside the IETF because the IETF doesn't worry about
10 that level. 02:58:33

11 Q. Right. Can you explain that some more.
12 Why is it that the IETF does not worry about the
13 level of defining user interfaces?

14 MR. WONG: Objection. Vague.

15 THE WITNESS: Well, at least at the time 02:58:44
16 the IETF was more concerned about direct
17 interoperability at the protocol level because that
18 was what was really required. IETF did not concern
19 itself with -- and at the time, I want to be careful
20 and qualify that because it has changed -- but the 02:59:00
21 IETF did not concern itself with user interfaces,
22 APIs and implementation details.

23 BY MR. PAK: Q. Counsel for Arista showed
24 you a number of older IETF documents during today's
25 deposition. 02:59:17

1 Do you recall that?

2 A. Mm-hmm.

3 Q. Do you recall whether any of these IETF
4 standards documents mandated a particular type of
5 CLI interface in order to qualify as an 02:59:25
6 IETF-complaint device?

7 A. I'm not aware of any of these that have.

8 Q. And looking at the specific list of
9 commands that were identified, I believe, in
10 Exhibit 149. 02:59:43

11 A. Yes.

12 Q. Are you aware, sitting here today, of any
13 IETF or OSI industry standard document that requires
14 these specific CLI commands to be used in order to
15 comply with an IETF or OSI standard? 03:00:11

16 A. So I am unaware for any specific
17 requirement for exactly these commands. Trying to
18 do something that referred to BGP peer groups
19 without using the word "peer group" or "BGP" would
20 have been very difficult. 03:00:29

21 Q. And we'll explore some of those.

22 But just, sitting here today, are you aware
23 of any specific IETF or OSI standards document that
24 mandates the use of any of the CLI commands in
25 Exhibit 149 in order the comply with that standard? 03:00:45

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1 A. No.

2 Q. One of the things that you mentioned that
3 you did at Procket was, I believe, take a different
4 approach to BGP functionality in terms of CLI
5 network interface; is that true? 03:01:02

6 A. No. Again, we tried to be bug-for-bug
7 compatible with a couple of exceptions.

8 Q. I thought you mentioned something about
9 doing something different with respect to peer
10 groups? 03:01:12

11 A. Correct.

12 Q. Okay. Can you explain what you did that?

13 A. I don't remember the details, but there
14 were several sections. Again, this is one of the
15 exceptions where customers found that the Cisco 03:01:20
16 implementation was not to their liking, and they
17 requested some small changes, and we just did what
18 they asked for rather than what Cisco had done.

19 Q. And if you could pull up, I believe,
20 Exhibit 147 which is one of the Procket documents, 03:01:41
21 as well as 146 and 148 I believe are the
22 documents that were -- or 145 were the documents
23 that were given to you --

24 A. Okay.

25 Q. -- relating to your work at Procket. 03:01:54